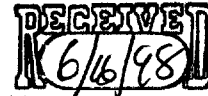


June 8, 1998

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Director
Special Nutritionals
Center for Food Safety and Applied Nutrition
FDA
200 C Street S.W.
Washington, DC 20204



Dear Sir / Madam:

This is a 30-day notification for a dietary supplement that will be on the market within 30 days. The product name is **The Ultimate Fat Fighting System**. The claims on the 30 and 60 count packages are identical and are:

"The Ultimate Fat Fighting System" is an all natural, safe and stimulant-free dietary supplement that combines our three most popular "fat fighting" formulas into a single convenient and comprehensive product. It is designed for use by individuals seeking support in their efforts to reduce body fat without resorting to drastic caloric restriction. None of the components in the Ultimate Fat Fighting System are stand-alone weight loss products; instead, they are each designed to offer assistance in achieving your optimum weight loss potential when used in conjunction with a program of exercise and reduced fat consumption such as the Lean Lifestyle Program. Each convenient Perma-Fresh packet combines the diverse fat fighting support of our three most successful Fat Fighting formulas: Garcinia+Plus, Chitosan+Plus and Fat Burning Factors. Each of these unique Fat Fighting formulas is described in greater detail below:

The **"Garcinia+Plus"** component in the Ultimate Fat Fighting System contains our own unique standardized extract of the Garcinia Cambogia fruit. We call this natural plant extract CitriPlus™ and we have standardized its content to deliver not less than fifty percent Hydroxycitrate. Certain research studies have shown that Hydroxycitrate may suppress the appetite and reduce the conversion of carbohydrates into fat. The Garcinia +Plus in the Ultimate Fat Fighting System is designed to be taken just before a large meal to curtail your appetite and help limit the later conversion of carbohydrates from that meal into stored body fat."

The **"Chitosan+Plus"** component in the Ultimate Fat Fighting System contains a natural fiber derived from the chitinous exoskeleton of shellfish. Several animal studies have shown that when this special blend of fiber is taken with food, it can bind with the fat in that food, thereby helping to reduce the absorption of fat from food. This stems from Chitosan's unique attraction for one of the most undesirable and unhealthy components in the modern diet: Fat. Animal studies indicate that each gram of Chitosan can interfere with the absorption of up to 81 calories of fat. We also add Vitamin C because research has shown that it can enhance the beneficial properties of Chitosan. The results of human studies on fat absorption are still pending.

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LET 1790



THE WINNING COMBINATION

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The "Fat Burning Factors" component in the Ultimate Fat Fighting System is designed to supply the nutrients necessary or related to fat metabolism to those individuals seeking to lose weight by engaging in a program of aerobic fat burning activity. If you perform the fat burning work, Fat Burning Factors is designed to supply the nutrients established by research to help maximize your "fat fighting" potential. Fat Burning Factors contains high levels of Vitamin C and the amino acid Lysine, because these essential nutrients are necessary to create Carnitine. Carnitine is important because it is required for the movement of all fats to the location in the cell where these fats can be burned. Your body cannot produce its own Carnitine reserves without Vitamin C and Lysine. We also include high levels of all the B-Complex vitamins because they are both directly and indirectly required for all fat burning to occur. In addition, important minerals such as Chromium, Boron and Vanadium, along with several key amino acids are included in this unique formula.

Respectfully Submitted,

Scott Bennett
R&D Associate